

May 20, 2014

Subject:	Name of Pesticide Product:	RF2201-08 DFB Block RF2201-04 DFB Block RF2201-02 DFB Block RF2201-01 DFB Block
	EPA File Symbol:	89459-O, 89459-I, 89459-T, 89459-A
	DP Barcode:	420057, 420059, 420062, 420058
	Decision #:	490524, 490527, 490526, 490525
	Action Code:	R310, R310.1, R310.1, R310.1
	PC Code:	108201 Diflubenzuron

From: Tracy Keigwin, Biologist
Technical Review Branch
Registration Division (7505P)

To: Reuben Baris, RM 07
Insecticide-Rodenticide Branch
Registration Division (7505P)

Applicant: Central Garden & Pet Company
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173

EPA File Symbol	89459-O	0.08% Diflubenzuron; 99.92% Other Ingredients	Total: 100%
EPA File Symbol	89459-I	0.04% Diflubenzuron; 99.96% Other Ingredients	Total: 100%
EPA File Symbol	89459-T	0.02% Diflubenzuron; 99.98% Other Ingredients	Total: 100%
EPA File Symbol	89459-A	0.01% Diflubenzuron; 99.99% Other Ingredients	Total: 100%

BACKGROUND: Central Garden & Pet Company have submitted applications for the registration of RF2201-08 DFB Block, RF2201-04 DFB Block, RF2201-02 DFB Block and RF2201-01 DFB Block, EPA File Symbols 89459-O, 88459-I, 89459-T and 89459-A, respectively. The proposed products are cattle and equine feed supplements containing 0.08% Diflubenzuron (EPA File Symbol 89459-O), 0.04% Diflubenzuron (EPA File Symbol 89459-T), 0.02% Diflubenzuron (EPA File Symbol 89459-I) and 0.01% Diflubenzuron (EPA File Symbol 89459-A) for the control of listed fly species in the manure of cattle and horses.

The registrant has submitted a waiver request (MRID 49367301) applicable to each of the above submissions and has proposed acute toxicity categories based on the acute toxicity of the source product. Please see the "Confidential Appendix" for the name of the source product. Note that the information in the "Confidential Appendix" must be considered CBI and treated as such.

COMMENTS AND RECOMMENDATIONS:

1) We will accept the acute toxicity categories proposed by the registrant with the exception of the acute dermal toxicity category. The registrant has referenced both Category III and Category IV values based on the acute dermal LD₅₀ of the active and inert ingredients of the cited product. The registrant proposed a toxicity category of IV, however TRB believes that the appropriate acute dermal toxicity category is III for this product. The product that the registrant cites in their bridging argument, and comparable products referenced in their cover letter (EPA Reg Nos 270-379 and 89459-3) all contain label language indicative of Category III for acute dermal toxicity. In the absence of the submission of product specific acute dermal toxicity data the Agency must choose the more protective category. If the registrant disagrees with this categorization they must submit or cite (with MRID number) an acute dermal toxicity study.

Note that we do not classify the data listed below as "waived", as waived studies are indicative of very high (category I) or very low (category IV) acute toxicity. This data is cited since the registrant is making comparisons to the toxicity of the product listed in the "Confidential Appendix". The acute toxicity profile for EPA File Symbols 89459-O, 89459-I, 89459-T, and 89459-A is as follows:

acute oral toxicity	III	Cited
acute dermal toxicity	III	Cited
acute inhalation toxicity	IV	Cited
primary eye irritation	III	Cited
primary skin irritation	IV	Cited
dermal sensitization	No	Cited

2) A First Aid statement is required for these products and must list the associated language in the order of toxicity.

3) The product chemistry team must approve the proposed Basic formulations (all dated 4/21/2014) before this action can be finalized.

4) The following are the precautionary and first aid statements for this product, as obtained from the Label Review System:

LABELING:

ID #: 089459-0

RF2201-08 DFB BLOCK

SIGNAL WORD: CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

LABELING:

ID #: 089459-I

RF2201-04 DFB BLOCK

SIGNAL WORD:

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

LABELING:

ID #: 089459-T RF2201-02 DFB BLOCK

SIGNAL WORD: CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

LABELING:

ID #: 089459-A RF2201-01 DFB BLOCK

SIGNAL WORD: **CAUTION**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

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User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Product ingredient source information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX

The product that the acute toxicity profile is based on is EPA [REDACTED].